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VIA ECF

The Honorable Thomas P. Griesa
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Prevezon Holdings, Ltd., et al., 13 Civ. 6326 (TPG)

Dear Judge Griesa:

At the telephone conference yesterday, we told the Court that Defendants' Motion in Limine No. 1 to Exclude Evidence Gathered Through Use of Grand Jury Subpoenas, Criminal Mutual Legal Assistance Treaties Requests and Other Secret Foreign Communications could be decided during trial rather than at the hearing on January 4, 2016. However, upon further thought, we believe it would be more efficient to argue the motion at the January 4 hearing. The motion is about the improper manner in which the Government collected evidence. Thus, the Court will not be better educated about the nature of evidence during the course of the trial, and the motion touches on evidence that the Government is likely to make reference to in its opening statement.

We, therefore, request that you add Defendants' Motion in Limine No. 1 to the agenda for argument on January 4.

Respectfully submitted,

s/ Mark A. Cymrot

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